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Attorneys for Defendants
SCCY Industries, LLC and Joe Roebuck

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

CHRISTOPHER D. ADAMS,

Plaintiff(s),

-v-

SCCY INDUSTRIES, LLC, d/b/a
SCCY FIREARMS, JOE ROEBUCK, ABC
COMPANIES (1-10) (fictitious names of
unknown entities), and JOHN DOES (1-10)
(fictitious names of unknown persons),

Defendant(s).

Civil Action No.: 3:20-cv-03149

**NOTICE OF MOTION TO SEAL THE
COMPLAINT PURSUANT TO LOCAL
CIVIL RULE 5.3, AND TO STRIKE
PORTIONS OF THE COMPLAINT
PURSUANT TO F.R.C.P. 12**

TO: ALL COUNSEL OF RECORD

PLEASE TAKE NOTICE that, on April 20, 2020, or as soon thereafter as the parties may be heard, Faegre Drinker Biddle & Reath, attorneys for SCCY Industries, LLC and Joe Roebuck (collectively, the “Defendants”) shall move for an Order pursuant to L. Civ. R. 5.3(c), to seal or otherwise restrict public access to the Complaint in the above-captioned matter, to strike the allegations in the Complaint containing attorney-client privileged information pursuant to Fed. R. Civ. P. 12 (f), and for other associated relief.

PLEASE TAKE FURTHER NOTICE that in support of this Motion, Defendants will rely upon the enclosed Brief in Support of the Motion, the Declaration of Lawrence J. Del Rossi, Defendants' Consolidated Index in Support of its Motion, and all other pleadings and memoranda on file in this matter.

PLEASE TAKE FURTHER NOTICE that Defendants submit a proposed form of Order with proposed findings of fact and conclusions of law herewith.

Dated: March 23, 2020

By: /s/Lawrence J. Del Rossi_____

Lawrence J. Del Rossi
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